

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN,	:	No. 09 Civ. 5900 (RPP)(MHD)
Plaintiffs,	:	
-against-	:	ANSWER OF ENGAREH (M)
	:	SDN. BHD. TO THIRD-PARTY
	:	COMPLAINT
BANK OF NEW YORK, JP MORGAN CHASE,	:	
SOCIÉTÉ GÉNÉRALE, and CITIBANK,	:	
Defendants.	:	
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JP MORGAN CHASE & CO. and JP MORGAN	:	
CHASE BANK, N.A.,	:	
Third-Party Plaintiffs,	:	
-against-	:	
CERTAIN PARTIES WHOSE NAMES HAVE :	:	
BEEN REDACTED, ISLAMIC REPUBLIC OF	:	
IRAN, et al.	:	
Third-Party Defendants.	:	
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Third-Party Defendant Engareh (M) SDN. BHD., by its attorneys, KLG Luz & Greenberg LLP, asserts that this Court lacks jurisdiction over it and, as and for its answer to the third-party complaint in this action, alleges as follows:

1. Lacks knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 1, except denies that it has any interest in any funds that are the subject of this action.

2. Lacks knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 3, except denies that it has any interest in any funds that are the subject of this action.

3. Lacks knowledge or information sufficient to form a belief as to the truth of allegations of paragraph 3, except denies that it has any interest in any funds that are the subject of this action.

4. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 4.

5. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5.

6. Engareh is unable to plead with respect to paragraphs 6 through 98 because they have been omitted from the third-party complaint served on it.

7. Admits the allegations of paragraph 99.

8. Engareh is unable to plead with respect to paragraphs 100 through 128 because they have been omitted from the third-party complaint served on it.

9. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 129.

10. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 130.

11. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 131.

12. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 132 except denies any parts of paragraph 132 that constitute legal conclusions or that purport to define the rights and obligations of Engareh.

13. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 133.

14. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 134.

15. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 135.

16. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 136.

17. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 137.

18. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 138.

19. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 139.

20. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 140.

21. Admits the allegations of paragraph 141.

22. Admits the allegations of paragraph 142.

23. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 143.

24. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 144.

25. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 145.

26. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 146.

27. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 147.

28. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 148.

29. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 149.

30. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 150.

31. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 151.

32. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 152.

33. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 153.

34. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 154.

35. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 155.

36. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 156.

37. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 157.

38. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 158.

39. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 159.

40. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 160.

41. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 161.

42. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 162.

43. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 163.

44. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 164.

45. Paragraph 165 requires no responsive pleading.

46. Admits the allegations of paragraph 166 insofar as it transcribes excerpts from the CPLR.

47. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 167.

48. Paragraph 168 requires no responsive pleading.

49. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 169.

50. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 170.

51. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 171.

52. Paragraph 172 requires no responsive pleading.

53. Lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 173.

FIRST AFFIRMATIVE DEFENSE

54. Engareh is not in privity with third-party plaintiffs.

SECOND AFFIRMATIVE DEFENSE

55. Third-party plaintiffs have no right to recover attorneys' fees against Engareh.

THIRD AFFIRMATIVE DEFENSE

56. Engareh has no interest in any funds that are the subject of this action.

FOURTH AFFIRMATIVE DEFENSE

57. The Court lacks personal jurisdiction over Engareh.

WHEREFORE, the complaint against Engareh should be dismissed in its entirety.

February 2, 2012

KLG LUZ & GREENBERG LLP

By: _____/s/
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